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Leonard S. Sawicki Director FCC Affairs

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March 15, 1996

Mr. William F. Caton Secretary Federal Communications Commission Room 222 1919 M Street NW Washington, D.C. 20554 MAR 1 5 1996

TEDERAL COMMUNICATIONS COMMISSION OFFICE OF SECRETARY

Re: CC Docket 95-116: Local Number Portability

Dear Mr. Caton:

Today, Woody Traylor, Amy Zirkle, Beth Kistner and I met with Jason Karp, Matt Harthun, Mary DeLuca, Susan McMaster, Gregory Forbes, and Marian Gordon of the Common Carrier Bureau. The purpose of the meeting was to review MCI's position in this proceeding. The attached slides were used during the meeting and detail the matters discussed.

Sincerely,

Leonard S. Sawicki

Attachment

cc:

Ms. DeLuca

Mr. Forbes

Ms. Gordon

Mr. Harthun

Mr. Karp

Ms. McMaster

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LOCAL NUMBER PORTABILITY

MCI Telecommunications Corporation

1996 Telecom Act and Local Number Portability (LNP)

Statute Defines LNP:

 "Ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability or convenience when switching from one telecommunications carrier to another."

Local Routing and Numbering (LRN) as Call Model

FCC Should Adopt LRN as Model for LNP.

Majority of Carriers Nationwide Have Identified LRN as The Best Call Model.

NYNEX

Bell Atlantic (Maryland)

Bell South

Ameritech

Time Warner

MCI

MFS

TCG

Sprint Centel

GTE (Illinois)

US West

ATT

AirTouch

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MediaOne

CCTA

Sprint (LD)

Cox

ELI

LRN as Call Model for LNP

- All Major Switch Vendors Cooperated on Development of Switch Software.
 Initial Switch Requirements Completed 11/95.
- Software is Scheduled for General Availability by Mid-1997.
- Failure to Order Implementation of Industry Consensus Now Rewards RBOC Agenda to Delay.

FCC Should Adopt Date Certain for LNP Implementation

- State Workshops (e.g., Illinois) Prove LNP Implementation is Feasible by 9/97.
- Switch Software Generally Available by 6/97.
- SMS Operational by 1Q/97 in Illinois.
- Network Operations, Operator Services, Rating and Billing Implementation Commenced.

FCC Must Eliminate RBOC Incentives to Delay



- Revenue Streams from RCF/DID.
- RBOCs Want to Keep Access Revenues for Calls to CLECs for RCF/DID.

■ Insulates RBOCs from Virtually All Access Competition.

What Should FCC Do About Financial Incentives to Delay

- Require Competitively Neutral Pricing for RCF/DID Rochester Model.
- Peemption is Appropriate under Sec.251(e).
- Require RBOCs to Remit Access Revenues to CLECs From Calls Ported Via RCF/DID.
- Illinois Model Parties Agree on Principle to Provide Access Revenues to CLECs.

Release-to-Pivot and Other Anti-Competitive Routing Schemes

- Not Competitively Neutral Does Not Treat All Calls the Same.
- Forces CLECs Dependence on Incumbents.
- Delays Real LNP Availability
- No Assurance RTP Will Be Transparent to End Users.
- RTP Cannot Support Location and Service Portability.

The FCC Must Act to Implement LNP

Require Competitively Neutral Pricing for RCF/DID.

Require RBOCs to Remit Applicable
Access Revenues to CLECs for
RCF/DID Routed Calls.

- Adopt Database Solution With Neutral Third Party Administration.
- Set 9/1/97 as Date by which LNP Must Be Provided.

The FCC Must Act to Implement LNP

- Establish Reporting Milestones for Tracking LNP Progress.
- Establish Penalties for RBOC-Induced Delays past 9/1/97.
- Establish Requirement that Prohibits a LEC From Subjecting Interoffice Calls to Ported Numbers to Routing That is Less Direct than the LEC's Routing of its Own Non-Ported Interoffice Calls.